

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Crim. No. 1:21-cr-10104-PBS

VLADISLAV KLYUSHIN,

Defendant

ASSENTED-TO MOTION FOR EXCLUSION OF TIME UNDER
THE SPEEDY TRIAL ACT

The United States of America, by and through Assistant United States Attorneys Seth B. Kosto and Stephen Frank, respectfully moves this Court to exclude the time period from March 9, 2022, the date of the initial status conference in this matter, through and including the date of the parties' next status conference, April 12, 2022, pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv), on the grounds that the ends of justice served by excluding this period outweigh the best interests of the public and the defendant in a speedy trial. In support of this request, the government states it produced substantial automatic discovery on or about February 2, 2022; counsel for the defendant has made several informal discovery requests and expects to make additional requests in the next two weeks, to which the government has responded or will respond. The government is also working to retain a vendor that will allow it to produce the automatic discovery in a searchable format. Thus, the time period from the March 9, 2022 status conference to the parties' next status conference on April 12, 2022 is a period of time that constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and that the ends of justice served by granting the

requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Respectfully submitted,

RACHAEL S. ROLLINS
Acting United States Attorney

By: /s/ Seth B. Kosto
SETH B. KOSTO
Assistant United States Attorney

March 11, 2022

CERTIFICATE OF SERVICE

I certify that this document was filed on the date listed below through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Seth B. Kosto

SETH B. KOSTO

Assistant United States Attorney

Dated: March 11, 2022